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Attorney for Defendant
QUENTIN NELSON

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:24-CR-00314-DJC
Plaintiff,)
vs.)
QUENTIN NELSON,)
Defendant.)

) **STIPULATION REGARDING
EXCLUDABLE TIME PERIODS UNDER
THE SPEEDY TRIAL ACT; FINDINGS AND
ORDER**
)) DATE: October 23, 2025
)) TIME: 9:00 AM
)) JUDGE: Hon. Daniel J. Calabretta
))

STIPULATION

The United States of America, by and through its counsel of record, Ross Pearson, and Quentin Nelson (“Defendant”), by and through his counsel of record, Assistant Public Defender, Noa Oren, hereby stipulate as follows:

1. By previous order, this matter was set for status on October 23, 2025.
 2. By this stipulation, the parties now move to continue the status conference until December 4, 2025, at 9:00 a.m., and to exclude time between October 23, 2025, and December 4, 2025, under Local Code T4 and 18 U.S.C. § 3161(h)(7)(A), (h)(7)(B)(iv).
 3. Mr. Nelson has been indicted on 2 counts related to child exploitation: Count One charges Mr. Nelson with Receipt and Attempted Receipt of Child Pornography, in violation of 18 U.S.C. §§ 2252A(a)(2)(A), (b)(1); and Count Two charges Defendant with Possession of Prepubescent Child Pornography, in violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2). Due to

1 the nature of the investigation and charges, discovery in this case has been voluminous and will
2 require careful and thorough review by the parties. The parties obtained a joint Protective Order
3 on April 17, 2025, to govern discovery dissemination. (ECF No. 12). The defense has reviewed
4 discovery. Defense requires additional time to conduct follow-up investigation and mitigation.
5 Mr. Nelson is housed at Taft so communication with him will require more labor and potential
6 travel at this stage.

7 4. Accordingly, the parties agree and stipulate, and request that the Court find the
8 following:

- 9 a) Pursuant to the aforementioned Protective Order, the United States has
10 provided counsel for the defendant with a large amount of discovery in this
11 case, which includes records of FBI and CDCR reports, access to full
12 electronic data extractions from multiple devices, search warrant records
13 returns, chat logs, bank records and peer-to-peer payment logs from multiple
14 institutions relating to accounts in various names. The United States has
15 also provided CDCR records, recorded media, and records from various
16 electronic service providers.
- 17 b) Counsel for Defendant desires additional time to work with her investigator
18 to conduct her own investigation and to discuss potential resolutions with
19 her client.
- 20 c) Counsel for Defendant believes that failure to grant the above-requested
21 continuance would deny her the reasonable time necessary for effective
22 preparation, taking into account her exercise of due diligence.
- 23 d) The United States does not object to the brief continuance.
- 24 e) Based on the above-stated findings, the ends of justice served by continuing
25 the case as requested outweigh the interest of the public and Defendant in a
26 trial within the original date prescribed by the Speedy Trial Act.
- 27 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. §

1 3161, et seq., within which trial must commence, the time period of October
2 23, 2025 to December 4, 2025, inclusive, is deemed excludable pursuant to
3 18 U.S.C. §§ 3161(h)(7)(A), B(iv) [Local Code T4] because it is a
4 continuance granted at Defendant's request on the basis of the Court's
5 finding that the ends of justice served by taking such action outweigh the
6 best interest of the public and Defendant in a speedy trial.

7 5. Nothing in this stipulation and order shall preclude a finding that other provisions
8 of the Speedy Trial Act dictate that additional time periods are excludable from the period within
9 which a trial must commence.

10 IT IS SO STIPULATED.

12 Dated: October 1, 2025

13 HEATHER E. WILLIAMS
14 Federal Defender

15 */s/ Noa E. Oren*
16 NOA E. OREN
17 Attorney for Defendant
 QUENTIN NELSON

19 Dated: October 1, 2025

19 ERIC GRANT
20 United States Attorney

21 */s/ Ross Pearson*
22 ROSS PEARSON
23 Assistant United States Attorney

ORDER

IT IS SO FOUND AND ORDERED this 3rd day of October, 2025.

/s/ Daniel J. Calabretta

HON. DANIEL J. CALABRETTA

UNITED STATES DISTRICT COURT JUDGE